

REDACTED – FOR PUBLIC INSPECTION

Filed via Commission's Electronic Comment Filing System (ECFS)

June 27, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

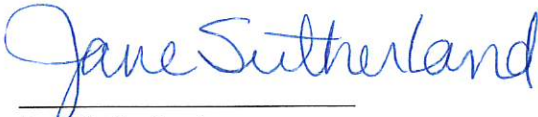
Re: *In the Matter of Connect America Fund ETC Annual Reports and Certifications, WC Docket Nos. 10-90, 14-58*

Dear Ms. Dortch:

On behalf of Holway Telephone Company, in accordance with the procedures outlined in the Protective Order¹, please find attached Holway Telephone Company's Redacted Confidential FCC Form 481 filing. This filing is uploaded on the FCC's Electronic Comment Filing System (ECFS).

Please do not hesitate to contact me at (402) 426-6242 if you have any questions regarding this submission.

Respectfully submitted,



Jane Sutherland
Regulatory Manager
American Broadband

Encl.

¹ *In the Matter of Connect America Fund ETC Annual Reports and Certifications*, WC Docket Nos. 10-90, 14-58, DA 16-296 released March 22, 2016.

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Jane Sutherland
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	jsutherland@americanbb.com
	Form Type	54.313 and 54.422

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext:
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

<210> For the prior calendar year, were there any reportable voice service outages?

No

[illegible]

**(300) Unfulfilled Service Request
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	421929
<015> Study Area Name	HOLWAY TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035> Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421928
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

[500] Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
		421929mo510.pdf
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sucherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsucherland@americanbb.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	421929mo610.pdf

(700) Price Offerings including Voice Rate Data		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013
<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com
<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	18.0

[illegible]

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

[illegible]

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	421929
<015> Study Area Name	HOLWAY TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035> Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

<900> Does the filing entity offer tribal land services? (Y/N)

No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://abbnlssouri.com/Lifeline>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2005) Price Cap Carrier Additional Documentation**Data Collection Form***Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	401228242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.

<2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.

<2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.

<2024A> Round 2 Recipient of Incremental Support?

<2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.

Name of Attached Document Listing
Required Information

<2025A> Round 2 Recipient of Incremental Support?

<2025B> Attach geocoded information for Phase I milestone reports (Round 2 for year three) - Connect America Fund, WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).

Name of Attached Document Listing
Required Information

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

<010>	Study Area Code	421929
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<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009) Progress Report on 5 Year Plan
Carrier certifies to 54.313(f)(1)(iii)

Yes - Attach Certification

(3010A) Certification of Public Interest Obligations (47 CFR § 54.313(f)(1)(i))

(3010B) Please Provide Attachment

Name of Attached Document Listing Required Information

421929mo3010b.pdf

(3012A) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

(3012B) Please Provide Attachment

No - No New Community Anchors

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No)

☒ ☐

(3014) If yes, does your company file the RUS annual report

(Yes/No)

☐ ☒

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☐

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited?

(Yes/No)

☒ ☐

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

☒

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.

☒

If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

☐

(3023) Underlying information subjected to a review by an independent certified public accountant

☐

(3024) Underlying information subjected to an officer certification.

☐

(3025) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

421929mo3026.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010> Study Area Code	421929
<015> Study Area Name	HOLWAY TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035> Contact Telephone Number - Number of person identified in data line <030>	4024265242 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

Financial Data Summary

- (3027) Revenue
- (3028) Operating Expenses
- (3029) Net Income
- (3030) Telephone Plant In Service(TPIS)
- (3031) Total Assets
- (3032) Total Debt
- (3033) Total Equity
- (3034) Dividends

<010>	Study Area Code	421929
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<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information _____

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information _____

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information _____

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
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<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: HOLWAY TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/23/2017
Printed name of Authorized Officer: Joe Jetensky	
Title or position of Authorized Officer: President	
Telephone number of Authorized Officer: 4024266245 ext.	
Study Area Code of Reporting Carrier: 421929	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	421929
<015> Study Area Name	HOLWAY TEL CO
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<030> Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035> Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent Firm: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Name of Authorized Agent Employee: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Holway Telephone Company

Certification of Compliance with Applicable Service Quality Standards and Consumer Protection Rules for Voice and Broadband Services

Service quality standards and consumer protection rules for broadband are not as defined as the rules for voice services. The Company complies with any service quality standards and consumer protection rules for broadband that are out there now and any that will be defined in the future.

Service Quality Standards

For voice services, the Company:

- Provides voice grade access to the public switched network.
- Provides flat rated local exchange service with no additional charge to end users.
- Provides access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911.
- Provides toll blocking and toll limitation services.

For voice and broadband services, the Company:

- Advertises the availability of its services and the charges using media of general distribution and/or on its website.
- Maintains a business office providing customers with access to a customer service representative either in person or via a local telephone call or toll-free telephone number during business hours.
- Directs after hour calls to the Company's help desk.
- Directs trouble reports to the on-call technician.
- Tracks all service orders to ensure they are completed in a timely manner.
- Measures its service connection and service interruption performance on a regular basis.
- Trains employees to:
 - Answer all incoming calls promptly.
 - Respond to all inquiries for information promptly and courteously.
 - Investigate thoroughly all customer complaints and handle appropriately according to the Company's guidelines for resolution of customer complaints.
 - Be knowledgeable about products and service offerings so they can assist the customer with selecting the best service option.
- Has a process for periodic inspection, testing and preventive maintenance of its equipment to permit the rendering of safe, adequate and continuous service at all times.
- Meets or exceeds the standards established by the state commission and provides any reports required in accordance with the state commission's rules.

Consumer Protection Rules

The Company has established operating procedures designed to facilitate compliance with applicable consumer protection rules which include compliance with the Customer Proprietary Network Information (CPNI) rules. The operating procedures include:

- Appointment of a compliance officer.
- A manual detailing the specific procedures for protecting consumer information.
- Employee training on an annual basis.
- A disciplinary process for improper use of consumer information.

If complaints are filed with the Company regarding consumer protection rules, the complaint is immediately investigated, the matter tracked and any corrective action noted. This process ensures that problems are addressed and corrections made.

**Holway Telephone Company
KLM Telephone Company**

Functionality in Emergency Situations

Back-Up Power

Both Rich Hill and Maitland switches have 7-8 hours of battery backup. Both have a fixed generator with auto startup that will carry the total electrical load of the building. CO's in Skidmore, Metz, Deerfield, and Richards are designed with 7-8 hours of battery backup but do not have a fixed generator. We have portable generators to backup the batteries. All DLC's are for 5-6 hours of battery backup. We have portable generators as a backup to the batteries in the DLC's.

Rerouting of Traffic around Damaged Facilities

The Rich Hill switch's toll traffic routes to BlueBird Networks by fiber which is redundant and diverse. Maitland switch's toll traffic routes to CenturyLink by fiber which is redundant. Each DLC has a working fiber circuit with a hot standby. The same local loop serves both the voice and broadband service to the subscriber.

Traffic Spikes

Our DLC's are designed with a 4:1 concentration ratio to our switches. Trunk capacity to BlueBird Network and CenturyLink Network is set by high busy hour traffic capacity. The switches in Rich Hill and Maitland are non-blocking. The broadband pipe to the world includes enough capacity to carry 20% more data than at peak usage times.

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

[illegible]

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com
<810>	Reporting Carrier	Holway Telephone Company
<811>	Holding Company	American Broadband Communications et al.
<812>	Operating Company	Holway Telephone Company

<a1>	<a2>	<a3>
Affiliates	SAC	Doing Business As Company or Brand Designation
Cameron Telephone Company, LLC (LA)	270425	Cameron Communications
Cameron Telephone Company, LLC (TX)	440425	Cameron Communications
Elizabeth Telephone Company, LLC	270430	Cameron Communications
LBH, LLC	279014	Cameron Communications
Interior Telephone Company	613011	TelAlaska
Mukluk Telephone Company, Inc.	613016	TelAlaska
TelAlaska Cellular Inc.	619013	
K.L.M. Telephone Company	421900	American Broadband
Arlington Telephone Company	371517	
The Blair Telephone Company	371524	
Eastern Nebraska Telephone Company	371542	
Rock County Telephone Company	371546	
HunTel Cablevision Inc.	379016	HunTel Communications
AMA Communications, LLC	449020	
Dialog Telecommunications, Inc. (KY)	269011	
Dialog Telecommunications, Inc. (MS)	289012	
Cameron Communications, LLC		Cameron Communications
N.W. Communications Co.		American Broadband
TelAlaska Long Distance, Inc.		TelAlaska Networks

Holway Telephone Company
Progress Report of 5 Year Plan – Certification of Public Interest Obligations

To be in compliance with the Certification of Public Interest Obligation of providing upon a reasonable request broadband service at actual speeds of 10 Mbps downstream/1 Mbps upstream:

- Holway Telephone Company certifies that it has taken reasonable steps to provide upon a reasonable request broadband service at actual speeds of 10 Mbps downstream/1 Mbps upstream with latency suitable for real-time applications, including Voice over Internet Protocol.
- The Company provides usage capacity that is reasonably comparable to comparable offerings in urban areas.
- The Company certifies that requests for such service are met within a reasonable amount of time.

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT – LINE 3026

ATTACHMENT REDACTED IN ENTIRETY